

LAW OFFICES OF SCOTT J GOLDSTEIN, LLC
280 WEST MAIN STREET
DENVER, NEW JERSEY 07834
TEL: 973-453-2838
FAX: 973-453-2869
SJG@SGOLDSTEINLAW.COM
Scott J. Goldstein, Esq. (016472004)

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
NEWARK VICINAGE**

In re:

New England Motor Freight, Inc.

Chapter 11 Debtor

Case No. 19-12809

Chapter 11

Hon. John Sherwood

DECLARATION OF SCOTT J. GOLDSTEIN, ESQ.

SCOTT J. GOLDSTEIN, ESQ. hereby declares as follows under penalty of perjury:

1. I am an attorney at law of the State of New Jersey, admitted to practice before this Court.
2. I am a member of the firm of Allen Chern, LLC, counsel to the creditors, Darrell and Melinda Londos in this matter.
3. I am the attorney with primary responsibility for this matter, as such, I have personal knowledge of the facts set forth in this Declaration, which I make in opposition to the Liquidating Trustee's Third Omnibus Motion to Disallow Claims.
4. State Court counsel Wayne Felle filed Claim 1319 in this matter. Said claim was one of the subjects of a prior motion to disallow, which this Court decided on June 29, 2020.
5. A motion to allow a late filed claim to be deemed filed timely *nunc pro tunc* for the purpose of allowance of the aforesaid claim and participation in the Auto Claims Protocol.
6. The motion was unopposed by the Debtor, but an opposition was made by United States Fire Insurance Company ("USFIC").

7. The motion was resolved by consent, and marked “consent order to be submitted” at the hearing date of November 17, 2020.
8. The undersigned mailed an original of the consent order was mailed to counsel for UFSIC, however same has not yet been submitted to the Court by USFIC.
9. The undersigned will submit the consent order to the Court tomorrow, and that consent order will agree to allow Claim 1319 for the purposes of participating in the Auto Claims Protocol.
10. It seems disingenuous to disallow this claim at this time, especially as it is limited to the Auto Claims Protocol and the funds available thereunder and not as against the Estate. It is my understanding that unless the claim remains allowed at least for that limited purpose, the insurers will not allow the creditors to participate in the Auto Claims Protocol
11. As such, Melinda and Darrell Londos, through the undersigned Counsel request that the Court deny the motion as to their claim, at least until the Auto Claims Protocol can be utilized and the claim determined thereunder.

I HEREBY DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING STATEMENTS MADE BY ME ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND INFORMATION. I UNDERSTAND THAT IF ANY OF THE FOREGOING STATEMENTS MADE BY ME ARE KNOWINGLY FALSE, I AM SUBJECT TO PUNISHMENT.

Dated: December 1, 2020

/s/Scott J. Goldstein
SCOTT J. GOLDSTEIN